

EXHIBIT A

Civil Cover Sheet

PLAINTIFF'S NAME EDWARD AMBROSANO		FILING NUMBER 16-1-0016298	
PLAINTIFF'S ADDRESS 2330 S. PERCY ST. PHILA PA 19148		DEFENDANT'S NAME ARS NATIONAL SERVICES, INC.	
PLAINTIFF'S NAME		DEFENDANT'S ADDRESS 201 W. GRAND AVE. ESCONDIDO CA 92025	
PLAINTIFF'S ADDRESS		DEFENDANT'S NAME	
PLAINTIFF'S NAME		DEFENDANT'S ADDRESS	
PLAINTIFF'S ADDRESS		DEFENDANT'S NAME	
TOTAL NUMBER OF PLAINTIFFS 1		TOTAL NUMBER OF DEFENDANTS 1	
COMMENCEMENT OF ACTION			
<input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal			
<input type="checkbox"/> Writ or Summons <input type="checkbox"/> Transfer From Other Jurisdictions			
AMOUNT IN CONTROVERSY		COURT PROGRAMS	
<input checked="" type="checkbox"/> \$50,000.00 or less <input type="checkbox"/> More than \$50,000.00		<input checked="" type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Other	
		<input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival	
CASE TYPE AND CODE 10 - CONTRACTS OTHER			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			
IS CASE SUBJECT TO COORDINATION ORDER? YES NO			
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: EDWARD AMBROSANO Papers may be served at the address set forth below.			
NAME OF PLAINTIFF/PETITIONER/APPELLANT'S ATTORNEY FRED E. DAVIS		ADDRESS 500 OFFICE CTR DR SUITE 400 FT. WASHINGTON PA 19034	
PHONE NUMBER (855) 432-8475		FAX NUMBER (855) 435-9294	
SUPREME COURT IDENTIFICATION NO. 93907		E-MAIL ADDRESS freddavis04@aol.com	
SIGNATURE OF FILING ATTORNEY OR PARTY FRED DAVIS		DATE SUBMITTED Tuesday, January 05, 2016, 03:49 pm	

Received
JAN 11 2016
ARS National Services, Inc.

JAN 11 2016

ARS National Services, Inc.
Fred Davis, Esquire
Identification No. 93907
DAVIS CONSUMER LAW FIRM
500 OFFICE CTR DR STE 400
FT. WASHINGTON, PA 19034
(T) 1-855-432-8475/(F) 1-855-435-9294
fdavis@usacreditlawyer.com

EDWARD AMBROSANO
2330 S. Percy St.
Phila, PA
19148

Plaintiff

v.

ARS NATIONAL SERVICES, INC.
201 W. GRAND AVE.
ESCONDIDO, CA
92025

Defendant

ATTORNEY FOR PLAINTIFF

THIS IS AN ARBITRATION MATTER.
ASSESSMENT OF DAMAGES
HEARING IS REQUESTED.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY

CIVIL ACTION

DOCKET NO.:

NOTICE TO DEFEND
CODE: 1900

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you.

You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

**PHILADELPHIA COUNTY BAR ASSOCIATION-LAWYER REFERRAL & INFO
SERVICE**

Philadelphia Bar Association
1101 Market Street, 11th Floor
Phila, PA 19107
Phone: (215) 238-6300
Fax: (215) 238-1159

AVISO

Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requiere que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

**LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE
ABOGADO O SI NO TIENE EL DINERO SUFFICIENTE DE PAGAR TAL SERVICIO.**

**VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA
DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE
PUEDE CONSEGUIR ASISTENCIA LEGAL.**

SERVICIO DE REFERENCIA LEGAL
Colegio de Abogados de Philadelphia
1101 Market Street, 11th Floor
Phila, PA 19107
Phone: (215) 238-6300
Fax: (215) 238-1159

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ARS National Services, Inc.

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Fred Davis, Esquire ARS National Services, Inc.
Identification No. 93907
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(T) 1-855-432-8475/(F) 1-855-435-9294
fdavis@usacreditlawyer.com

ATTORNEY FOR PLAINTIFF

THIS IS AN ARBITRATION MATTER.
ASSESSMENT OF DAMAGES HEARING IS
REQUESTED.

EDWARD AMBROSANO
2330 S. Percy St.
Phila, PA
19148

COURT OF COMMON PLEAS

PHILADELPHIA COUNTY

Plaintiff

v.

ARS NATIONAL SERVICES, INC.
201 W. GRAND AVE.
ESCONDIDO, CA
92025

CIVIL ACTION

Defendant

COMPLAINT

1. Plaintiff, EDWARD AMBROSANO, is an adult individual citizen and legal resident of the State of Pennsylvania, living at 2330 S. Percy St., Phila, Pa 19148.

2. Defendant, ARS NATIONAL SERVICES, INC., is a business corporation qualified to and regularly conducting business in, the Commonwealth of Pennsylvania, with its legal residence and principal place of business at 201 W. GRAND AVE., ESCONDIDO, CA 92025. Defendant can be served at that address.

3. Plaintiff avers that at all times material hereto, Defendant acted by and through its authorized agents, servants, officers, and/or employees, including Defendant, all of whom were acting within the scope of their employment.

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ARS National Services, Inc.

JURISDICTION AND VENUE

4. Jurisdiction of this court arises pursuant to 15 U.S.C. § 1692k(d), which states that such actions may be brought and heard before "any appropriate United States district court without regard to the amount in controversy, or in any other court of competent jurisdiction".

5. Defendant regularly conducts business in the State of Pennsylvania and in the County of Philadelphia, therefore, personal jurisdiction is established.

6. Venue is proper in Philadelphia County pursuant to Pennsylvania Rules of Civil Procedure 1006 and 2179.

7. Declaratory relief is available pursuant to 28 U.S.C. §§ 2201 and 2202.

PARTIES

8. Plaintiff is a natural persons residing in Phila, PA.

9. Plaintiff is a "consumer(s)" as that term is defined by 15 U.S.C. § 1692a(3), as the alleged debt was incurred in the pursuit and acquisition of household goods and services.

10. Defendant, ARS NATIONAL SERVICES, INC., is a company handling debt collection matters with headquarters located at 201 W. GRAND AVE., ESCONDIDO, CA 92025.

11. Defendant is a debt collector as that term is defined by 15 U.S.C. §1692a(6), and regularly identifies itself as such in correspondence with Plaintiff. See Exhibit "A".

12. Defendant acted through their agents, employees, officers,

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members, directors, heirs, successors, assigns, principals, trustees, sureties, subrogees, representatives, and insurers.

FACTUAL ALLEGATIONS

13. On or about June 17, 2015, Defendant sent Plaintiff a letter which purported to collect on a CITIBANK N.A./ SUNOCO CREDIT CARD. *See Exhibit "A".*

14. Defendant's letter further offered Plaintiff two options:

"1. Settle your account at 40% of the above balance in six installments (of \$32.97 each);

2. Good faith payment plan: Enclose your good faith down payment of \$49.46 and send monthly payments of \$24.73 until the balance is paid". *Id.*

15. Plaintiff alleges and avers that Defendant misrepresented the amount needed to satisfy the alleged debt, because the "good faith payment plan" does not specify the total balance needed to satisfy the debt, even though it requires a higher down payment than the "settle" option, and is thus in violation of 15. U.S.C. § 1692e.

16. Plaintiff alleges and avers that Defendant's letter deliberately sought to confuse and mislead Plaintiff into paying a higher amount, and that Defendant's language implies that either payment will satisfy the alleged debt, while at the same time creates such ambiguity as to make it unclear exactly what is required to "settle" or satisfy the "good faith payment plan", and is thus in violation of 15. U.S.C. § 1692e. *Id.*

17. Plaintiff further alleges and avers that Defendant made or caused to be made numerous, offensive phone calls to Plaintiff and unrelated third-parties attempting to collect the alleged "debt", and often times failed to properly identify itself, in violation of 15 U.S.C. §§ 1692c(a)(1) and d.

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ARS National Services, Inc.

18. Plaintiff further alleges and avers that Defendant failed to notify the relevant credit bureaus that the alleged debt was in dispute, in violation of 15 U.S.C. § 1692e.

19. Plaintiff alleges and avers that Defendant failed to notify Plaintiff that litigation premised on the alleged is time-barred, and Defendant thereby misrepresented the legal status of the alleged debt, in violation of 15 U.S.C. § 1692e.

COUNT I
THE FAIR DEBT COLLECTION PRACTICES ACT

20. In its actions to collect a disputed debt, Defendant violated the FDCPA in one or more of the following ways:

- a. Harassing, oppressing or abusing Plaintiff in connection with the collection of a debt in violation of 15 U.S.C. § 1692d.
- b. Using misrepresentations or deceptive means to collect a debt in violation of 15 U.S.C. § 1692e(10).
- c. Using unfair or unconscionable means to collect a debt in violation of 15 U.S.C. § 1692f.
- d. Attempting to collect an amount not authorized by contract or law in violation of 15 U.S.C. § 1692f.
- e. By acting in an otherwise deceptive, unfair and unconscionable manner and failing to comply with the FDCPA.

WHEREFORE, Plaintiff, EDWARD AMBROSANO, respectfully prays for a judgment as follows:

- a. All actual compensatory damages suffered pursuant to 15

U.S.C. § 1692k(a)(1);

- b. Statutory damages of \$1,000.00 for the aforementioned violation(s) of the FDCPA pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c. All reasonable attorneys' fees, witness fees, court costs and other litigation costs incurred by Plaintiff pursuant to 15 U.S.C. § 1693k(a)(3); and
- Any other relief deemed appropriate by this Honorable Court.

DAVIS CONSUMER LAW FIRM

By:

/s/

Fred Davis-PA ID# 93907
Attorney for Plaintiff, EDWARD AMBROSANO
500 Office Center Drive-Suite 400
Ft. Washington, PA 19034
Tel - 1-855-432-8475/Facsimile-1-855-435-9294
Email: fdavis@usacreditlawyer.com

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VERIFICATION

Fred Davis, states that he is the attorney for the Plaintiff herein; that he is acquainted with the facts set forth in the foregoing Complaint; that same are true and correct to the best of his knowledge, information and belief; and that this statement is made subject to the Penalties of 18 Pa. C.S.A. §4904, relating to unsworn falsifications to authorities.

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JAN 11 2016

DAVIS CONSUMER LAW FIRM

ARS National Services, Inc.

By: /s/

Fred Davis-PA ID# 93907
Attorney for Plaintiff, EDWARD AMBROSANO
500 Olice Center Drive-Suite 400
Ft. Washington, PA 19034
Tel - 1-855-432-8475/Facsimile-1-855-435-9294
Email: fdavis@usacreditlawyer.com

Department #M0840

P.O. Box 1259

Oaks, PA 19456

ADDRESS SERVICE REQUESTED



June 17, 2015

EDWARD A AMBROSANO III
2830 S PERCY ST
PERCY
PHILADELPHIA PA 19148-3711

ARS National Services, Inc.

PO Box 469100

Escondido, CA 92046-9100

(800) 665-3128 FAX: (866) 422-0765

www.PayARS.com

ACCOUNT IDENTIFICATION

Creditor: Citibank, N.A./SUNOCO CONSUMER

Account No.: *****4901

ARS Reference No.: 31303925

Balance: \$494.54

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Dear Sir/Madam:

ARS National Services, Inc.

We would like to recommend the following payment options to resolve your unpaid account. Please choose one of the following options:

1. Settle your account at 40% of the above balance in six installments:

(If you cannot make the settlement payment by the dates below, please contact us to discuss all your payment options.)

Payment One: \$32.97 by 7/4/2015

Payment Four: \$32.97 by 10/2/2015

Payment Two: \$32.97 by 8/3/2015

Payment Five: \$32.97 by 11/2/2015

Payment Three: \$32.97 by 9/2/2015

Payment Six: \$32.97 by 12/2/2015

2. Good faith payment with payment plan:

Enclose your good faith down payment of \$49.46 and send monthly payments of \$24.73 until the balance is paid. If you cannot make the payment by the 25th of each month, please contact us to discuss all your payment options.

We reserve the right to treat any missed or late payment as a cancellation of the agreement. We are not obligated to renew these offers. Upon receipt of your final payment, ARS and our client will consider this account either paid in full or settled based on the option chosen.

Whenever \$600.00 or more in principal of a debt is discharged as a result of settling a debt for less than the balance owing, the creditor may be required to report the amount of the debt discharged to the Internal Revenue Service on a 1099C form, a copy of which would be mailed to you by the creditor. If you are uncertain of the legal or tax consequences, we encourage you to consult your legal or tax advisor.

To make a payment or review other options on this account, please visit our website at www.PayARS.com which is available 24 hours a day. ARS also offers "Quick Check" by phone, Western Union "Quick Collect" (Code City: ARS 31303925), and Moneygram "Express Payment" (Receive Code: 2471). Payments, made payable to Citibank, can be mailed to the ARS Escondido, CA address above.

Contact your account representative at (800) 665-3128 for details. Office hours are Monday through Friday, 6:00 a.m. - 7:00 p.m. and Saturday 6:00 a.m. - 12:00 p.m. (Pacific Time).

Sincerely,

ALEC TILLEY X5708

Account Representative

A

THIS COMMUNICATION IS FROM A DEBT COLLECTOR. THIS IS AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

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